

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division

USDC - GREENBELT  
'23 NOV 3 PM2:22

IN RE POSSIBLE VIOLATIONS OF  
18 U.S.C. § 371, 1001; 26 U.S.C. §§ 7201,  
7203, 7206, 7212; 31 U.S.C. §§ 5314, 5322

Misc. No. 23 mc 00553

FILED EX PARTE & UNDER SEAL

**ORDER GRANTING EX PARTE APPLICATION FOR SUSPENSION  
OF THE RUNNING OF THE STATUTES OF LIMITATIONS**

Based on the Application filed by the United States of America, and the accompanying Declaration of Internal Revenue Service Criminal Investigation Special Agent Andrew Accardi, the Court makes the following findings:

1. A grand jury duly impaneled in this District has been conducting an investigation of Thomas Che Goldstein and other individuals for the following possible criminal offenses: (i) conspiring to defraud the United States, in violation of 18 U.S.C. § 371; (ii) evading taxes, in violation of 26 U.S.C. § 7201; (iii) making and subscribing to a false tax return, in violation of 26 U.S.C. § 7206(1); (iv) aiding and assisting the preparation of false and fraudulent tax returns, in violation of 26 U.S.C. § 7206(2); (v) willfully failing to pay individual income tax, in violation of 26 U.S.C. § 7203; (vi) corruptly endeavoring to obstruct the due administration of the internal revenue laws, in violation of 26 U.S.C. § 7212(a); (vii) willfully failing to file a report the ownership or control of, or signatory authority, or other authority over, a foreign financial account, in violation of 31 U.S.C. §§ 5314, 5322; and (viii) making false statements to an agency of the United States, in violation of 18 U.S.C. § 1001.

2. No indictment has been returned.

3. The United States has filed an *ex parte* application for an order suspending the

statute of limitations in accordance with the provisions of Title 18, United States Code, Section 3292.

4. The government's application is accompanied by the declaration of Special Agent Accardi, made under penalty of perjury, which summarizes the relevant facts uncovered during the investigation.

5. It reasonably appears, based on a preponderance of the evidence presented to the Court, that an official request, as defined in 18 U.S.C. § 3292(d), was made to Montenegro, by the Office of International Affairs of the United States Department of Justice on September 25, 2023, and no final action has been taken by Montenegro on that request.

BASED ON THE ABOVE, IT IS HEREBY ORDERED that the government's *ex parte* application for suspension of the running of the statute of limitation is hereby GRANTED; and


IT IS FURTHER ORDERED that the running of the statute of limitations for the offenses set forth in the government's *ex parte* application is hereby SUSPENDED for the period authorized by 18 U.S.C. § 3292(b) and (c).

DONE AND ORDERED at Greenbelt, Maryland, this 3<sup>rd</sup> day of October, 2023.

I hereby attest and certify on 3 November 2023 that the foregoing document is a full, true and correct copy of the original on file in my office and in my legal custody.

CATHERINE M. STAVLAS  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

By  Deputy

  
HONORABLE THEODORE D. CHUANG  
UNITED STATES DISTRICT JUDGE